

217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Winpak Heat Seal Corporation
Attn: Bruce Hoerr, Director of Operations
201 Hanna Drive
Pekin, Illinois 61554

Application No.: 06040051

I.D. No.: 179473AAI

Applicant's Designation:

Date Received: April 26, 2006

Subject: Flexographic Printing

Date Issued: TO BE DETERMINED

Location: 1821 Riverway Drive, Pekin

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of two flexographic printing presses, one plate making system and two wash tanks, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.1 Flexographic Printing Presses

1.1.1 Description

The new printing presses will be used for the printing, coating and finishing of aluminum foil and paper packaging for various food, beverage, dairy and health care products.

1.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Flexo Printing Press 1	Nine-station Flexographic Printing Press	None
Flexo Printing Press 2	Nine-station Flexographic Printing Press	None

1.1.3 Applicable Provisions and Regulations

- a. The "affected press" for the purpose of these unit-specific conditions, are the presses described in Conditions 1.1.1 and 1.1.2.
- b. Each affected press is subject to 35 IAC 212.321(a), which provides that no person shall cause or allow the emission of particulate matter (PM) into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

- c. Each affected press is subject to 35 IAC 215.301, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided by the following exception: if no odor nuisance exists the limitation shall apply only to photochemically reactive material.

1.1.4 Non-Applicability of Regulations of Concern

- a. The affected presses are not being subject to 40 CFR Part 63, Subpart KK: National Emission Standards for the Printing and Publishing Industry, because the affected presses are not publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses and the source is not a major source of hazardous air pollutants (HAPs).
- b. The limitations of 35 IAC 215 Subpart P: Printing and Publishing, do not apply to this facility because aggregate uncontrolled rotogravure and/or flexographic printing press emissions of volatile organic material are limited by operating permit conditions to 907 Mg (1000 tons) per year or less in the absence of air pollution control equipment and actual emissions in the absence of air pollution control equipment would be less than or equal to 907 Mg (1000 tons) per year when averaged over the preceding three calendar years [35 IAC 215.402].

1.1.5 Control Requirements and Work Practices

Control requirements and work practices are not set for the affected units.

1.1.6 Production and Emission Limitations

- a.
 - i. VOM usage for the affected presses from ink, coating, solvent, etc. shall not exceed 36.9 tons/month and 307.0 tons/year.
 - ii. HAP usage for the affected presses from ink, coating, solvent, etc. shall not exceed 1.2 tons/month and 9.4 tons/year for the individual HAP and 2.4 tons/month and 19.7 tons/year for the combination of HAPs.
 - iii. Compliance with the annual limits shall be determined from a running total of 12 months of data.
- b. Emissions from the affected presses and all other emission units at the plant shall not exceed the following limits. Compliance with the annual limits shall be determined from a running total of 12 months of data.

<u>Pollutant</u>	<u>Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
VOM	28.8	240.0

Individual HAP	1.2	9.4
Total HAP	2.4	19.7

1.1.7 Testing Requirements

Upon request of the Illinois EPA, testing for VOM content of inks, coatings, cleaning solvents, and other materials shall be performed as follows [35 IAC 215.409]:

- a. The VOM content of representative inks, coating, cleaning solvents, and other materials "as applied" on the affected press shall be determined according to USEPA Reference Methods 24 or 24A of 40 CFR 60, Appendix A, and the procedures of 35 IAC 215.105(a).
- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records required by Condition 1.1.9 directly reflect the application of such material and separately account for any additions of solvent.

1.1.8 Monitoring Requirements

Monitoring requirements are not set for the affected presses.

1.1.9 Recordkeeping Requirements

- a. The Permittee shall keep a file with information demonstrating that the maximum hourly organic material emissions from the affected presses comply with 35 IAC 215.301.
- b. The Permittee shall collect and record all of the following information for the affected presses:
 - i. Usage of VOM and HAP containing material (tons/month and tons/year).
 - ii. VOM content of each material used, wt. %.
 - iii. HAP content of each material used, wt. %.
 - iv. Quantity of VOM shipped offsite as waste with supporting documentation (tons/month and tons/year).
 - v. VOM and HAP emissions, with supporting calculations, as determined by the procedures in Condition 1.1.12(b) to demonstrate compliance to Conditions 1.1.6 (tons/month and tons/year).

1.1.10 Reporting Requirements

- a. Reporting of Deviations

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected presses with

the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

- i. Emissions of VOM and HAP from the affected presses in excess of the limits specified in Condition 1.1.6, within 30 days of such occurrence.
- ii. Operation of the affected presses in excess of the limits specified in Condition 1.1.6 within 30 days of such occurrence.

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected presses.

1.1.12 Compliance Procedures

- a. Compliance with Condition 1.1.3(b) is considered to be assured by the normal work practices and maintenance activities inherent in operation of the affected presses.
- b. Compliance with the emission limits in Condition 1.1.6 are determined by the following emission factors and emission formulas listed below:

Appropriate Emissions, Tons = \sum (Material Usage, Tons) x
(Appropriate Material Content, Wt. %) - VOM contained
in the waste, tons

Where: \sum = The summation of all VOM and HAP containing
materials used in the affected press.

- 2a.
 - i. Operation of the two wash tanks shall not exceed the following limits: 2.2 tons VOM used per month and 18.2 tons VOM used per year.
 - ii. Emissions of VOM from the two wash tanks shall not exceed 0.6 tons/month and 5.0 tons/year.
 - iii. Compliance with the annual limits shall be determined from a running total of 12 months of data.
- b. The Permittee shall maintain records of the following items:
 - i. VOM usage for the two wash tanks (tons/month and tons/year).
 - ii. Quantity of VOM shipped offsite as waste with supporting documentation (tons/month and tons/year).
 - iii. VOM emissions from the two wash tanks (tons/month and tons/year).
- 3a.
 - i. Emissions of VOM from the plate maker shall not exceed 0.1 tons/month and 0.9 tons/year.

- ii. Compliance with the annual limits shall be determined from a running total of 12 months of data.
- b. The Permittee shall maintain records of the VOM emissions from the plate maker with supporting calculations and documentation (tons/month and tons/year).
- 4a. The affected presses addressed by this construction permit may be operated under this permit until July 1, 2008.
- b. The Permittee must submit its complete CAAPP application for the plant within 12 months after commencing operation of the plant, pursuant to Section 39.5(5)(x) of the Act.

If you have any questions on this permit, please contact Jason Schnepf at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JMS:psj

cc: Region 2